

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ANDERSON ST. JOHN, individually and on behalf
of all others similarly situated,

Plaintiffs,

-against-

ADESA, INC.,

Defendant.

Case No. 2:22-cv-01257-GRB-AYS

**DECLARATION OF
NATALIE MURRAY**

NATALIE MURRAY declares pursuant to 28 U.S.C. § 1746, and subject to the penalties of perjury that the following is true and correct:

1. I am Regional Human Resources Director for ADESA, East Region. I submit this declaration in support of Defendants' motion to join ADESA NY, LLC as a defendant to this action pursuant to Federal Rules of Civil Procedure 19(a) or 20(a)(2), and to dismiss the Complaint pursuant to Federal Rule of Civil Procedure 12(b)(1). The facts and circumstances set forth in this declaration are based on my own personal knowledge and ADESA's books and records.

2. ADESA NY, LLC ("ADESA NY") is part of the ADESA East Region.

3. ADESA NY employs individuals at the three ADESA locations in New York, which are located in Long Island, Syracuse and Buffalo.

4. ADESA NY is organized under the laws of the State of New York, and wholly owned by ADESA, Inc. Attached hereto as **Exhibit A** is a true and correct copy of ADESA NY, LLC's Certificate of Organization.

5. I am ultimately responsible for the HR functions of ADESA NY and other ADESA-affiliated sites in my region. All Human Resources Business Partners and District Human Resources Managers for the East Region sites report into me.

6. There are 302 employees assigned to, and employed by, ADESA NY. Based on my review of ADESA NY's Workday HRIS system, which I access in the ordinary course of business, I have determined that all 302 employees have a primary residential address in New York. All but one of the employees based at the three ADESA locations in New York (Long Island, Buffalo, and Syracuse) are employed by ADESA NY. The one exception is an HR Business Partner who works at the ADESA Buffalo location, and also lives in New York State; she is employed by AUA ADESA US Auction LLC.

7. All 302 employees assigned to, and employed by, ADESA NY at the Long Island, Buffalo, and Syracuse locations are paid by ADESA NY.

8. There are two additional individuals employed by another ADESA entity – AUA ADESA US Auction LLC – who work remotely but have primary residential addresses in New York. These individuals' titles are Customer Service I and Specialist, Inside Transportation, respectively.

9. At all relevant times, Plaintiff was employed and paid by ADESA NY.

10. There are no ADESA NY employees who work outside of New York.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 30, 2022


Natalie Murray